



SPECIALIST PROSECUTOR'S OFFICE  
ZYRA E PROKURORIT TË SPECIALIZUAR  
SPECIJALIZOVANO TUŽILAŠTVO

**In:** KSC-BC-2020-05  
**Specialist Prosecutor v. Salih Mustafa**

**Before:** **Trial Panel I**  
Judge Mappie Veldt-Foglia, Presiding  
Judge Roland Dekkers  
Judge Gilbert Bitti  
Judge Vladimir Mikula, Reserve

**Registrar:** Dr Fidelma Donlon  
**Filing Participant:** Specialist Prosecutor  
**Date:** 7 July 2022  
**Language:** English  
**Classification:** Public

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**Prosecution request for extension of word limit**

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**Specialist Prosecutor's Office**

Jack Smith

**Counsel for the Accused**

Julius von Bóné

**Victims' Counsel**

Anni Pues

1. Pursuant to Article 36(1) of the Practice Direction,<sup>1</sup> the Specialist Prosecutor's Office ('SPO') requests that the Trial Panel authorise a limit of 45,000 words for the SPO's final trial brief due on 21 July 2022. This request is made sufficiently in advance and good cause exists for the requested extension.
2. While the SPO intends to heed the Trial Panel's instructions and file a focused and concise brief,<sup>2</sup> the SPO's analysis covers evidence presented by 28 witnesses between Prosecution and Defence during 44 days of trial testimony. The extension will allow the SPO sufficient opportunity to address the Accused's responsibility under the different modes alleged in the Indictment, and to respond – concisely but effectively – to the Defence's assertion of an alibi defence, alleging the Accused's presence in several different locations during the Indictment period.
3. The extension will also enable the SPO to include comprehensive submissions on sentencing, this case being the first war crimes case adjudicated before the Kosovo Specialist Chambers.
4. In light of the foregoing reasons, the SPO respectfully requests the Trial Panel to grant a 15,000 words extension of the word limit.

**Word count: 221**



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**Jack Smith**  
**Specialist Prosecutor**

Thursday, 7 July 2022

At The Hague, the Netherlands.

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<sup>1</sup> Practice Direction. Registry Practice Direction, Files and Filings before the Kosovo Specialist Chambers, KSC-BD-15, 17 May 2019.

<sup>2</sup> Decision on the closing of the evidentiary proceedings and related matters, KSC-BC-2020-05/F00439, Public, 20 June 2022, para.19.